

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

IN THE MATTER OF:

DILIP JANA  
*Plaintiff,*

v.

WALMART, INC.,  
*Defendant.*

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Civil Action No. 4:24-cv-00698-SDJ-BD

**FILED**

JUL 21 2025

CLERK, U.S. DISTRICT COURT  
TEXAS EASTERN

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PLAINTIFF'S NOTICE REGARDING WALMART'S NON-COMPLIANT JULY 18, 2025  
PRODUCTION UNDER RULE 26(g)

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*Pro Se* Plaintiff Dr. Dilip Jana respectfully submits this Notice to inform the Court that on July 18, 2025, Walmart served a purported "Supplemental production" of documents **via email from paralegal Christina DeLeon**. This production consisted of password-protected files and was not accompanied by any certification or signature as required by Federal Rule of Civil Procedure 26(g). Nor did Walmart identify the applicable discovery request, disclosure category, or designate whether any of the materials are subject to the Protective Order currently in effect.

Prior to this production, Plaintiff had formally placed Walmart on notice of these procedural requirements by filing Dkt. 84 on July 17, 2025, explicitly advising that any further document productions must comply with Rule 26(g) and include appropriate authenticity safeguards. Despite this clear notice, Walmart proceeded with an uncertified and ambiguously labeled production.

Plaintiff has acknowledged receipt of the production but has not opened the password-protected files due to the absence of a Rule 26(g)-compliant certification and uncertainty regarding any confidentiality designation. On July 21, 2025, Plaintiff sent an email to Walmart's counsel requesting clarification regarding the basis, scope, and confidentiality status of the July 18 production. A copy of that email is attached as EXHIBIT A-1 solely to preserve the record.

This Notice is submitted to preserve the record and to respectfully alert the Court that Walmart's July 18 production appears procedurally deficient under Rule 26(g), and has placed Plaintiff at risk of inadvertently violating the Protective Order due to Walmart's failure to identify or label the contents. Plaintiff reserves all rights to seek further relief.

Respectfully submitted,

Dated: July 21, 2025

Respectfully Submitted,

  
DILIP JANA, Plaintiff  
*Pro Se*  
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800 Fairlawn St, Allen, TX, 75002

**CERTIFICATE OF SERVICE**

On July 21, 2025, a true and correct copy of the foregoing was served upon the following through the

Court's CM/ECF system:

Peter S. Wahby  
Texas Bar No. 24011171  
Peter.wahby@gtlaw.com

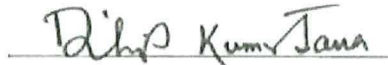
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ATTORNEYS FOR DEFENDANT WALMART INC.

Dated: July 21, 2025

Respectfully Submitted



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